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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH CENTRAL DIVISION**

THREAD WALLETS LLC, a Utah limited liability company, Plaintiff, v. BRIXLEY BAGS, LLC, a Utah limited liability company; Defendant.	BRIXLEY BAGS, LLC’S MOTION FOR LEAVE TO FILE UNDER SEAL A MOTION FOR SUMMARY JUDGMENT OF INVALIDITY Case No. 2:23-cv-00874 Judge Jill N. Parrish Magistrate Judge Jared C. Bennett
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Defendant Brixley Bags, LLC (“**Brixley**”) hereby moves for leave under DUCivR 503(b) to file a Motion for Summary Judgment of Invalidity under seal. Brixley makes this motion and has made redacted filings because the Plaintiff Thread Wallets LLC (“**Plaintiff**”) has designated numerous materials as “AEO” or Confidential. Brixley’s own view is that none of the deposition testimony or documents designated “AEO” should remain under seal; rather, Brixley brings this Motion due to Plaintiff’s position, which Brixley has challenged and continues to challenge.

Brixley asserts that Plaintiff’s designations do not qualify as confidential under the definition of AEO Confidential under the Protective Order. Nonetheless, Brixley submitted redacted filings in good faith and in recognition that the status of these redactions is in dispute.

Brixley believes these materials should be part of the public record in this action.

DATED: June 17, 2025.

Respectfully submitted,

KB&A

/s/ Bryan B. Todd

Chad S. Pehrson

Thomas D. Briscoe

Bryan B. Todd

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, I caused to be filed a true and correct copy of the foregoing **BRIXLEY BAGS, LLC’S MOTION FOR LEAVE TO FILE UNDER SEAL A MOTION FOR SUMMARY JUDGMENT OF INVALIDITY** via the Court’s electronic filing system, which effectuated service on all counsel of record.

/s/ Bryan B. Todd